

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

BRIAN KEITH ALFORD A196-744

ENTER ABOVE THE NAME OF THE PLAINTIFF IN THIS ACTION)

THE PLAINTIFF IS A PRISONER: PRISONER # A196-744

vs.

ANNETTE CHAMBERS-SMITH, DR. ANDREW EDDY,

ENTER ABOVE THE NAME OF THE DEFENDANT IN THIS ACTION)

THERE ARE ADDITIONAL DEFENDANTS PLEASE LIST THEM:

WILLIAM COOL, PATRICIA HORNER, GARY WYNN PERTERSON,

T. NEFF, T. DIEHL, R. HUFF, LORI PETERMAN,

COMPLAINT

2524 CV 4184

JUDGE SARGUS 1

MAGISTRATE JUDGE SILVAIN

PARTIES TO THE ACTION:

PLAINTIFF: PLACE YOUR NAME AND ADDRESS ON THE LINES BELOW. THE ADDRESS YOU GIVE MUST BE THE ADDRESS THAT THE COURT MAY CONTACT YOU AND MAIL DOCUMENTS TO YOU. A TELEPHONE NUMBER IS REQUIRED.

BRIAN KEITH ALFORD A196-744

NAME - FULL NAME PLEASE - PRINT

ROSS CORRECTIONAL INSTITUTION

ADDRESS: STREET, CITY, STATE AND ZIP CODE

P.O. Box 7010 Chillicothe, Ohio 45601

TELEPHONE NUMBER

IF THERE ARE ADDITIONAL PLAINTIFFS IN THIS SUIT, A SEPARATE PIECE OF PAPER SHOULD BE ATTACHED IMMEDIATELY BEHIND THIS PAGE WITH THEIR FULL NAMES, ADDRESSES AND TELEPHONE NUMBERS. IF NO ADDITIONAL PLAINTIFFS EXIST CONTINUE WITH THIS FORM.

PAGE 2 AND 3 OF THIS FORM DEAL ONLY WITH A PLAINTIFF THAT IS INCARCERATED AT THE TIME OF FILING THIS COMPLAINT.

FILED
TIME
NOV 20 2024
RICHARD W. NAGEL, Clerk of Court
COLUMBUS, OHIO

PREVIOUS LAWSUITS:

A. HAVE YOU BEGUN OTHER LAWSUITS IN STATE OR FEDERAL COURT DEALING WITH THE SAME FACTS INVOLVED IN THIS ACTION OR OTHERWISE RELATING TO YOUR IMPRISONMENT? YES () NO ()

B. IF YOUR ANSWER TO A IS YES, DESCRIBE THE LAWSUIT IN THE SPACE BELOW. (IF THERE IS MORE THAN ONE LAWSUIT, DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THE SAME OUTLINE.)

1. PARTIES TO THIS PREVIOUS LAWSUIT

PLAINTIFFS:

BRIAN KEITH ALFORD

DEFENDANTS:

LORI PETERMAN, BRIAN WETTRUPP, JUSTICE, NOBLE, PARRISH,
SALYERS, WESTFALL, CRISSLER, BAKER, BLACKWELL, KILLIAN,
WEBB

2. COURT (IF FEDERAL COURT, NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY)

U.S. DISTRICT COURT/SOUTHERN DISTRICT/EASTERN DIVISION

3. DOCKET NUMBER

2:19-CV-1497

4. NAME OF THE JUDGE TO WHOM THE CASE WAS ASSIGNED

EDMOND A. SARGUS JR.

5. DISPOSITION (FOR EXAMPLE, WAS THE CASE DISMISSED? WAS IT APPEALED? IS IT STILL PENDING?)

DISMISSED WITHOUT PREJUDICE

6. APPROXIMATE DATE OF THE FILING OF THE LAWSUIT

July 10th, 2019

7. APPROXIMATE DATE ¹⁹ OF THE DISPOSITION

July 10th, 2019

A. IS THERE A PRISONER GRIEVANCE PROCEDURE IN THIS INSTITUTION?
YES NO ()

B. DID YOU PRESENT THE FACTS RELATING TO YOUR COMPLAINT IN THIS STATE PRISONER GRIEVANCE PROCEDURE? YES NO ()

C. IF YOUR ANSWER IS YES:

1. WHAT STEPS DID YOU TAKE?

ICR, GRIEVANCE, APPEAL FO GRIEVANCE, SIG SERVICES,

DIRECTOR, CIIC

2. WHAT WAS THE RESULT?

IGNORED MY COMPLAINTS

D. IF YOUR ANSWER IS NO, EXPLAIN WHY NOT.

E. IF THERE IS NO PRISON GRIEVANCE PROCEDURE IN THIS INSTITUTION, DID YOU COMPLAIN TO PRISON AUTHORITIES? YES NO ()

F. IF YOUR ANSWER IS YES:

1. WHAT STEPS DID YOU TAKE?

2. WHAT WAS THE RESULT?

PLACE THE NAME AND ADDRESS OF EACH DEFENDANT YOU LISTED IN THE CAPTION ON THE FIRST PAGE OF THIS COMPLAINT. THIS FORM IS INVALID UNLESS EACH DEFENDANT APPEARS WITH FULL ADDRESS FOR PROPER SERVICE.

1. ANNETTE CHAMBERS SMITH
NAMES - FULL NAME PLEASE

4545 Fisher Road Suite D., Columbus, Ohio 43228

ADDRESS - STREET, CITY, STATE AND ZIP CODE

2. DR. ANDREW EDDY

4545 Fisher Road Suite D., Columbus, Ohio 43228

3. WILLIAM COOL

4545 Fisher Road Suite D., Columbus, ohio 43228

4. PATRICIA HORNER

P.O. Box 5730 Toledo, Ohio 43613

5. GARY WYNN PETERMAN

65 SOUTH FRONT STREET 3rd FLOOR - COLUMBUS, OHIO 43215

6. T. NEFF

4545 Fisher Road Suite D., Columbus, Ohio 43228

IF THERE ARE ADDITIONAL DEFENDANTS, PLEASE CONTINUE LISTING THEM.

R. HUFF 4545 Fisher Road Suite D., Columbus, ohio 43228

LORI PETERMAN 4545 Fisher Road Suite D., Columbus, ohio 43228

T. DIEHL 43545 Fisher Road Suite D Columbus, Ohio 43228

STATEMENT OF CLAIM
PLEASE WRITE AS BRIEFLY AS POSSIBLE THE FACTS OF YOUR CASE. DESCRIBE HOW EACH DEFENDANT IS INVOLVED. INCLUDE THE NAME OF ALL PERSONS INVOLVED. GIVE DATES AND PLACES.

DO NOT GIVE ANY LEGAL ARGUMENTS OR CITE ANY CASES OR STATUTES.

IF YOU HAVE A NUMBER OF DIFFERENT CLAIMS; PLEASE NUMBER AND SET FORTH EACH CLAIM IN A SEPARATE PARAGRAPH. USE AS MUCH SPACE AS YOU NEED. YOU ARE NOT LIMITED TO THE PAPERS WE GIVE YOU. ATTACH EXTRA SHEETS THAT DEAL WITH YOUR STATEMENT CLAIM IMMEDIATELY BEHIND THIS PIECE OF PAPER.

(1) ANNETTE CHAMBERS-SMITH FAILED TO ACT AFTER BEING PLACED ON NOTICE
OF THE VIOLATIONS NAMED HEREIN

(2) DR. ANDREW EDDY FAILED TO TREAT PLAINTIFF FOR A LIFE-THREATENING
ILLNESS (HEP-C) IN VIOLATION OF THE EIGHTH AND FOURTEENTH AMENDMENTS

(3) WILLIAM COOL FAILED TO ACT AND TO PROTECT PLAINTIFF FROM THE
CONSTITUTIONAL VIOLATIONS COMMITTED BY HIS STAFF (DUE PROCESS/COMPULSORY)

(4) R. HUFF COMMITTED LIBEL/SLANDER WHEN ALLEGING PLAINTIFF
COMMITTED AN ACT OF MORAL TURPITUDE, WHICH REMOVED HIM FROM
SINCLAIR COLLEGE DENYING HIM CONTINUANCE OF HIS EDUCATION FOR
one year. , CAUSING DAMAGE TO PLAINTIFF'S REPUTATION.

(5) T. NEFF ALLOWED PLAINTIFF TO SIT IN RESTRICTIVE HOUSING FOR
AN INVALIDATED INCIDENT REPORT ALLEGING PLAINTIFF ASSAULTED HIS
CELLMATE, AND LATER ACCUSED PLAINTIFF OF TOUCHING HIS BUTTOCKS
CAUSING DAMAGE TO PLAINTIFF'S REPUTATION BY SLANDER/LIBEL

(6) PATRICIA HORNER RAILROADED PLAINTIFF'S CIVIL COMPLAINT AND
FAILED TO ADEQUATELY PERFORM THE DUTIES OF EFFECTIVE ASSISTANCE
OF COUNSEL BY INTENTIONALLY DELAYING/PERFECTING SERVICE UPON
ALL DEFENDANTS AND FAILING TO OBTAIN A COMPLETE COPY OF
PLAINTIFF'S MEDICAL FILE FROM 1996 to 1999 FOR ODRC; 2000 to
2011 FEDERAL BUREAU OF PRISONS ; AND 2011 to 2021 FOR ODRC

STATEMENT OF CLAIM

Case: 2:24-cv-04184-EAS-PBS Doc #: 1 Filed: 11/20/24 Page: 6 of 7 PAGEID #: 6

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(7) GARY WYNN PETERSON DENIED PLAINTIFF TO GIVE TESTIMONY RELEVANT
FOR BLAKE WILLIAMS UNPROVOKED ASSAULT BY ODRc STAFF IN SPITE
OF PLAINTIFF BEING SUBPOENED TO GIVE TESTIMONY FOR SAME

(8) T. DIEHL FAILED TO INVESTIGATE PLAINTIFF'S LOSS FOR COMMISSARY
PURCHASED BUT NEVER RECEIVED, AND IMPEDED STEPS FOR
REASONABLE ICR'S, GRIEVANCES, AND APPEALS OF SAME.
IN ADDITION, HE FALSIFIED DOCUMENTS RELATING TO PUBLIC RECORDS
REQUEST.

(9) LORI PETERMAN COMMITTED LIBEL/SLANDER DAMAGING PLAINTIFF'S
REPUTATION, PERSON, WHICH HAS PREVENTED HIM FROM REASONABLE
CONSIDERATION FOR PAROLE RELEASE.

EACH DEFENDANT'S ACTIONS CONSTITUTE A VIOLATION OF OFFICIAL POLICY
AND SUCH ACTIONS VIOLATED PLAINTIFF'S CONSTITUTIONAL RIGHTS.

IN THIS SECTION PLEASE STATE (WRITE) BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT, CITE NO CASES OR STATUTES.

RELIEF

(1) A DECLARATION THAT THE ACTS/OMISSIONS HEREIN VIOLATED
PLAINTIFF'S CONSTITUTIONAL RIGHTS UNDER OHIO AND UNITED
STATES CONSTITUTION

(2) A PRELIMINARY INJUNCTION AND TEMPORARY RESTRAINING ORDER
TO PREVENT DEFENDANTS FROM INTERFERING WITH PLAINTIFF'S
EQUAL PROTECTION, DUE PROCESS, AND RIGHT TO LIFE, LIBERTY,
AND FREEDOM, PROPERTY

(3) NOMINAL DAMAGES AUTHORIZED BY LAW AND DETERMINED BY A JURY
OF THIS COURT AGAINST EACH DEFENDANT

(4) PUNITIVE DAMAGES AGAINST EACH DEFENDANT DETERMINED BY A
JURY

(5) PLAINTIFF'S COST IN THIS ACTION

(6) APPOINTMENT OF COUNSEL.

(7) ANY ADDITIONAL RELIEF THIS COURT DEEMS JUST AND PROPER AND
EQUITABLE.

SIGNED THIS 15 DAY OF November 2024

Brian Keith Alford A196-744
SIGNATURE OF PLAINTIFF

BRIAN KEITH ALFORD A196-744